

EXHIBIT 2

From: Marlene Goldenberg <mjgoldenberg@goldenberglaw.com>
Sent: Tuesday, February 2, 2021 4:42 PM
To: Jessica Heinz; Ethan Feldman
Cc: Valsartan PEC (valpec@kirtlandpackard.com); Andrew Obergfell; Ben Stellpflug; Ashleigh Raso
Subject: Valsartan - Aurobindo - Meet and Confer

Follow Up Flag: Flag for follow up
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Jessica and Ethan,

Are you both available tomorrow at 11:00 EST to talk through a few things regarding Aurobindo?

Just so there aren't any big surprises, here is what I am hoping to cover:

- **Documents from Aurobindo Pharma Ltd.:** It is my understanding that we have no custodians from the Indian entity and therefore very few documents. As you know, our 30(b)(6) depositions cover the entire Auro family of entities in the case. If your witnesses intend to testify on behalf of Aurobindo Pharma, Ltd, we need to know that we have all documents that are going to be relevant to those topics.
- **Custodial File for David Palew:** He is your designee for many, if not most, of the most important 30(b)(6) topics. We are officially requesting that you add him as a custodial file and produce his documents.
- **How you searched for documents that have been produced so far:** As you know Aurobindo's document production is many times smaller than those of the other defendants. As we've discussed on the phone, it is difficult for us to know what we are missing. Therefore, we are hoping you can provide us with a letter that explains (1) How you searched for documents; (2) What files (custodial and noncustodial) were searched as to each entity; (3) How many documents were collected for review as a result of your collection, (4) how many documents in custodial files hit on search terms, and (5) how were actually produced of that set.
- **Standard Operating Procedures:** It is my understanding that we are missing any of these and that you discussed these on a call with Andrew yesterday. Please let us know when we can expect to receive these.

Please let me know if 11:00 works tomorrow or if there is a better time to discuss these topics.

Thanks,

Marlene



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